

EXHIBIT A

FILED
OCT 02 2014
PER WRO
HARRISBURG, PA DEPUTY CLERK

**PLAINTIFFS' POST TRIAL MOTION TO OBTAIN COPIES OF PLAINTIFF'S TRIAL EXHIBITS
NEEDED TO FILE THEIR DOCUMENTS AT THE 3RD CIRCUIT OF APPEALS**

AND NOW, come Plaintiffs, Gnana M. Chinniah and Suganthini Chinniah, respectfully file this motion seeking copies of Plaintiffs' Trial Exhibits from their former counsel or as an alternative from this Honorable Court since it is crucial to file their Brief and Appendix to the 3rd Circuit of Appeals. In support thereof Plaintiffs aver the following:

1. Plaintiffs' Post-trial motion of above captioned case was denied by this Court on June 26, 2014
2. Plaintiffs timely filed their Notice of Appeal on July 21, 2014 – Copy attached in Appendix A
3. United States Court of Appeals for the Third Circuit docketed the appeal under No. 14-3355 and issued a Briefing and Scheduling Order on August 29, 2014 with a due date for filing of Appellant's Brief and Appendix on or before October 8, 2014 – Copy attached in Appendix B
4. Plaintiffs (Appellants) are unable to get a copy of the Trial Exhibits as their former Counsel Joshua M. Autry claims that he does not have any of Plaintiffs' case files and referred them to his former employer, Clymer Musser and Conrad, PC of Lancaster, PA with copy to Jeff Conrad, Esq

5. Plaintiffs Gnana Chinniah and Suganthini Chinniah went to the Law Offices of Clymer Musser and Conrad in Lancaster on October 2, 2014 around 8:45 am to recover their case file with crucial documents needed as clearly explained in the chain email communications with parties involved.
6. Upon arrival at Clymer Law Offices, Plaintiff Gnana Chinniah was asked to sign a document stating that he has obtained the entire case file before even he even had a chance to verify if all of the crucial documents needed were in the file to be handed over to him after signing this paper.
7. When Mr. Chinniah made an annotation by underlining the words "entire file" and wrote "To be verified by the Chinniahs" and initialed there and signed and handed over this document and asked for a copy of this "release paper" and asked for the box with his documents, Attorney Conrad was called to notify about Mr. Chinniah's change in this document.
8. When Attorney Conrad came down to meet with the Chinniahs who were at the front desk, Mr. Chinniah asked him to show him the location of the Trial Exhibits in that box so he makes sure that ALL the crucial documents needed are in that box before he left this place in Lancaster, PA
9. Attorney Conrad stated that the Chinniahs have to get copies of Plaintiffs' trial exhibits went with the jury from this Honorable Court and demanded to sign on another original of their "release paper" and refused to hand over the documents which provoked arguments.
10. When Mr. Chinniah stated that he already signed on the "release paper" with a reasonable annotation as he did not have a chance to verify the contents in that box and attempted to leave the place with the documents in it, Attorney Conrad called Lancaster City Police and stated that the Chinniahs were stealing their files and leaving his office.
11. When Officers from the Lancaster City Police Department arrived, the Chinniahs explained their side of the story and the officers concluded there was no "theft/stealing" as Atty. Conrad complained about it, and asked the Chinniahs to leave the scene and notify the Court Staff.
12. Plaintiffs promptly reported about their difficulties in obtaining the crucial documents from Clymer Law Offices or from Attorney Joshua Autry to Ms. Shawna Cihack on October 1, 2014 and about the incident involving three (3) Lancaster City Police Officers on October 2, 2014.

13. Plaintiffs have also documented their difficulties in obtaining crucial documents by providing a copy of their email exchange with the attorneys involved – Copy included in Appendix C
14. Plaintiffs also wish to bring it to the attention of this Honorable Court that the Plaintiffs have uncovered that there are at least seven (7) witnesses to whom Subpoenas were served failed to appear at the Court House for their testimonies during the trial in November 2013, despite the fact Plaintiffs successfully defended at least two (2) Motions in Limine filed by the Defendants to protect these witnesses from providing their testimonies. These witnesses include several witnesses previously deposed and former/incumbent law makers, attorney, and police officers.
15. Plaintiffs also wish to bring it the attention of this Honorable Court that Plaintiff Gnana Chinniah clearly remembers that their trial Counsel Joshua Attorney refused to bring some crucial exhibits that were already admitted in the Pretrial submittals during his testimony to support his case and failed to produce about a dozen crucial exhibits of the Plaintiffs that survived Motions in Limine.
16. Plaintiffs also bring it to the attention of this Honorable Court about apparent serious misconduct of the attorneys involved who failed to notify this Honorable Court about those witnesses who ignored their Subpoenas and those attorneys who continue to obstruct justice by their questionable conduct of seriously misrepresenting the Plaintiffs and refusing to return their entire case files with crucial documents as evident from the chain email exchange included under Appendix C of this motion, and pray that these attorneys would be disciplined appropriately.

Wherefore, Plaintiffs respectfully request that this Honorable Court grant this motion in their favor and order Attorney Joshua Autry or the Law Offices of Clymer Musser and Conrad P.C. to provide all the crucial documents of the Plaintiffs needed in filing Brief and Appendix to Appeals Court or in the alternative this Court provides copies of Plaintiffs' Exhibits admitted to the jury during trial.

Respectfully Submitted,



Gnana M. Chinniah, Plaintiff, *Pro Se*



Suganthini Chinniah, Plaintiff, *Pro Se*

Date: October 2, 2014

506 Erford Road

Camp Hill, PA 17011

Home Tel: 717 732 6273

Email: chinniahg@hotmail.com

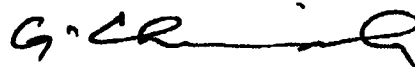
**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

GNANA M. CHINNIAH a/k/a	:	CIVIL ACTION NO: 1:CV-08-1330
GNANACHANDRA M. CHINNIAH	:	
and SUGANTHINI CHINNIAH,	:	Honorable Judge Yvette Kane
Plaintiffs	:	
v.	:	
EAST PENNSBORO TOWNSHIP and	:	
JEFFREY S. SHULTZ, Defendants	:	

CERTIFICATE OF NON-CONCURRENCE

I, Gnana M. Chinniah, Plaintiff, hereby certify that Counsel for Defendants does not concur in this motion

Respectfully Submitted,



Gnana M. Chinniah

506 Erford Road

Camp Hill, PA 17011

Home Tel: 717 732 6273

Email: chinniahg@hotmail.com

Date: October 2, 2014

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

GNANA M. CHINNIAH a/k/a	:	CIVIL ACTION NO: 1:CV-08-1330
GNANACHANDRA M. CHINNIAH	:	
and SUGANTHINI CHINNIAH,	:	Honorable Judge Yvette Kane
Plaintiffs	:	
v.	:	
EAST PENNSBORO TOWNSHIP and	:	
JEFFREY S. SHULTZ, Defendants	:	

CERTIFICATE OF SERVICE

I, Gnana M. Chinniah, hereby certify that on this day, ^{Oct. 2nd} ~~December 20, 2014~~, a true and accurate copy of PLAINTIFFS' POST TRIAL MOTION TO OBTAIN COPIES OF PLAINTIFFS' TRIAL EXHIBITS NEEDED TO FILE THEIR DOCUMENTS TO THE 3RD CIRCUIT COURT OF APPEALS has been served via U.S. First Class Mail upon the following person:

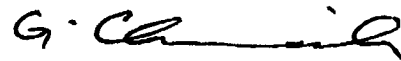
Christopher S. Underhill, Esq.
Hartman Underhill & Brubaker, LLP
221 East Chestnut Street
Lancaster, PA 17602

Jeffery A. Conrad, Esq.
Clymer Musser & Conrad P.C.
408 W. Chestnut Street
Lancaster, PA 17603

Joshua M. Autry Esq
Lavery Faherty Patterson
225 Market Street, Suite 304
Harrisburg, PA 17101

Date: October 2, 2014

Respectfully Submitted,



Gnana M. Chinniah

506 Erford Road

Camp Hill, PA 17011

Home Tel: 717 732 6273

Email:

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

GNANA M. CHINNIAH a/k/a	:	CIVIL ACTION NO: 1:CV-08-1330
GNANACHANDRA M. CHINNIAH	:	
and SUGANTHINI CHINNIAH,	:	Honorable Judge Yvette Kane
Plaintiffs	:	
v.	:	
EAST PENNSBORO TOWNSHIP and	:	
JEFFREY S. SHULTZ, Defendants	:	

PROPOSED ORDER

AND NOW, this _____ day of _____, 2014, in of the
PLAINTIFFS' POST TRIAL MOTION TO OBTAIN COPIES OF PLAINTIFFS' TRIAL EXHIBITS
NEEDED TO FILE THEIR DOCUMENTS TO THE 3RD CIRCUIT COURT OF APPEALS, and any
response thereto, it is hereby **ORDERED** that the motion is **GRANTED**. Attorney Joshua Autry and
Law Offices of Clymer Musser and Conrad , PC is hereby **ORDERED** to provide copies of Plaintiffs'
Trial Exhibits or in the alternative, the Clerk of Courts is hereby **ORDERED** to provide this document.

By the Court:

Yvette Kane, District Judge
United States District Court
Middle District of Pennsylvania

Appendix A

Appendix B

UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

No. 14-3355

Gnana Chinniah, et al v. Township of East Pennsboro, et al

(District Court No. 1-08-cv-01330)

BRIEFING AND SCHEDULING ORDER

Attorneys are required to file all documents electronically. See 3d Cir. L.A.R. 113 (2008) and the Court's CM/ECF website at www.ca3.uscourts.gov/ecfwebsite.

It is **ORDERED** that the brief for Appellant and the joint appendix shall be filed and served on or before 10/08/2014.

It is **FURTHER ORDERED** that the brief for Appellee shall be filed and served within thirty (30) days of service of Appellant's brief.

It is **FURTHER ORDERED** that a reply brief, if any, shall be filed and served within fourteen (14) days of service of Appellee's brief.

It is **FURTHER ORDERED** that in the event of default by Appellant in filing the brief and appendix as directed, the appeal may be dismissed without further notice.


It is **FURTHER ORDERED** that if Appellee fails to file a brief within the time directed, the matter will be listed on Appellant's brief only and Appellee may be subject to such sanctions as the Court deems appropriate.

It is noted that, where applicable, parties must comply with 3rd Cir. LAR 31.2 which provides: A local, state or federal entity or agency, which was served in the district court and which is the appellee, must file a brief in all cases in which a briefing schedule is issued unless the court has granted a motion seeking permission to be excused from filing a brief. The rule does not apply to entities or agencies that are respondents to a petition for review unless the entity or agency is the sole respondent or to entities or agencies which acted solely as an adjudicatory tribunal.

This Court requires the filing of briefs by counsel in both electronic and paper format. 3rd Cir. LAR 31.1(b). Pro Se litigants are exempt from the electronic filing requirement. Parties must file 7 copies of the briefs; pro se parties who are proceeding in forma pauperis may file only 4 copies. Costs for additional copies will be permitted only if the Court directs that additional copies be filed. Pursuant to 3rd Cir. LAR 30.1(a), counsel must electronically file the appendix in accordance with LAR Misc. 113.

Checklists regarding the requirements for filing a brief and appendix are available on the Court's website at www.ca3.uscourts.gov.

For the Court.



Marcia M. Waldron, Clerk

Dated: August 29, 2014

cc:

Gnana M. Chinniah,
Suganthini Chinniah,
Christopher S. Underhill, Esq.

Appendix C

Print

Close

RE: Chinniah, et al. v. East Pennsboro Township and Jeffrey S. Shultz

Gnana Chinniah (chinniahg@hotmail.com)

Wed 10 01 14 12:50 PM

chrisu@hublaw.com (chrisu@hublaw.com)

Brandon S. Harter (brandonh@hublaw.com); jautry@laverylaw.com (jautry@laverylaw.com);

jeff.conrad@clymerlaw.com (jeff.conrad@clymerlaw.com)

jpietropaoli@eastpennsboro.net (jpietropaoli@eastpennsboro.net); admin@eastpennsboro.net

(admin@eastpennsboro.net); jhertzler@ccpa.net (jhertzler@ccpa.net);

jkuntzelman@eastpennsboro.net (jkuntzelman@eastpennsboro.net); pbender@travelers.com

(pbender@travelers.com); mmiller@pennlive.com (mmiller@pennlive.com)

Dear Mr. Underhill,

Thank you for taking my call this morning when I contacted you to inform my situation in light of my inability make sure with Atty. Conrad and Atty. Autry if they would be able to confirm whether or not they would provide ALL of the crucial documents needed by the Plaintiffs to timely file their Brief and Appendix to the 3rd Circuit Court of Appeals. I spoke to Ms. Pamela Batts, Case Manager at the Clerk's Office in Philadelphia and Ms. Shawna Chack, Deputy to Hon. Judge Kane at the US District Court to find out the proper procedure to obtain these crucial documents that I am entitled to, and to notify some serious concerns regarding the conduct of the attorneys involved as described below in this chain email below.

I left messages for Atty. Autry and Atty. Conrad in their phone numbers briefly updating what is needed from them so my wife and I can decide before we make a trip to Lancaster whether ALL those crucial documents are there in my file. If required, I am told to file a Motion at the Trial Court in Harrisburg to get the list of Exhibits that went with the jury on behalf of the Plaintiffs which is very important to identify what other key evidences were NOT presented to the Trial Court although they were included in the Pretrial Submission successfully defeating at least two (2) Motions in Limine by the Defendants that were denied by Hon. Judge Kane. As I stated below at least seven (7) former and incumbent Twp officials some of whom are lawmakers and/or attorneys simply ignored their Subpoenas from the US District Court and failed to appear at the Court to provide their testimonies that I brought to the attention of the Court staff when I contacted them yesterday and today. By the way, as I told you over the phone, based on what I understand from the case manager, I do NOT have to file a joint Appendix with the Defendants. I am not prepared to be taken for a ride or taken advantage of based on my bitter experience of attorneys NOT presenting the entire evidence and witnesses to the District Court.

I am sure that you understand exactly where things stand and, therefore, would discuss matters with your client and the Court Staff and would provide the necessary cooperation so Plaintiffs exercise their rights for a fair appeal of their case and to protect them from the unfair conduct of their former counsel who betrayed the trust

and put us in this situation.

Sincerely,

Gnana Chinniah

From: chrisu@hublaw.com

To: chinniahg@hotmail.com

CC: brandonh@hublaw.com

Subject: RE: Chinniah, et al. v. East Pennsboro Township and Jeffrey S. Shultz

Date: Tue, 30 Sep 2014 19:56:06 +0000

Mr. Chinniah:

With regard to your list of witnesses, as I told you in my letter of September 25, I did not accept the subpoenas for Mr. Hertzler, Mr. DeMartyn, Mr. McMaster and Mr. Hausenauer because they were no longer employed by the Township at the time the subpoenas were presented to me. The other witnesses were served and were available to testify. They did not ignore the subpoenas. I asked Mr. Autry to let me know when he wanted them to appear and I would provide them. No request was ever made to the Court to require me to provide the witnesses nor was there any statement on the record regarding any alleged failure to appear. Therefore, there was no failure on the part of the Defendants or of me to provide witnesses.

If you intend to raise the alleged failure of these witnesses to appear in your appeal, your Post-Trial Motion and Brief do not raise that subject and, therefore, it is waived. I do not know what documents you are referring to in the remainder of your email. The Third Circuit will consider only documents of record before the trial court. Accordingly, I will not concur in any request for a thirty day extension. Please send me your proposed Joint Appendix as soon as possible.

C.S. Underhill



HARTMAN UNDERHILL
& BRUBAKER, LLC

Christopher S. Underhill, Esq.

Print Message

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[Close](#)

RE: Chinniah, et al. v. East Pennsboro Township and Jeffrey S. Shultz

From: **Gnana Chinniah** (chinniahg@hotmail.com)
Sent: Sun 9/28/14 10:31 PM
To: Jeff Conrad (jeff.conrad@clymerlaw.com); jautry@laverylaw.com (jautry@laverylaw.com); chrisu@hublaw.com (chrisu@hublaw.com); brandonh@hublaw.com (brandonh@hublaw.com)
Cc: Emily Bell (emily.bell@clymerlaw.com); Mary Dodds (mary.dodds@clymerlaw.com); Cristina Guthrie (cristina.guthrie@clymerlaw.com)
Bcc: jpietropaoli@eastpennsboro.net (jpietropaoli@eastpennsboro.net); admin@eastpennsboro.net (admin@eastpennsboro.net); jhertzler@ccpa.net (jhertzler@ccpa.net); jkuntzelman@eastpennsboro.net (jkuntzelman@eastpennsboro.net); mmiller@pennlive.com (mmiller@pennlive.com)

Dear Mr. Underhill,

Thank you very much for sending the CD with Defendants' Exhibits that went out with the jury, and copies of the Subpoenas delivered to you in November 2013. Please note that the following witnesses simply ignored their Subpoenas and failed to appear at the US District Court to provide their testimonies despite the fact that the Trial Judge, Hon. Judge Yvette Kane denied Defendants' two (2) Motions in Limine(s) to protect these witnesses from testifying:

1. Mr. James Hertzler, former East Pennsboro Twp Commissioner and present Cumberland County Commissioner
2. Mr. George DeMartyn, former President of the Board of East Pennsboro Twp Commissioners
3. Mr. James Kuntzelman, Current East Pennsboro Twp Commissioner
4. Mr. Wayne Melnick, Current East Pennsboo Twp Commissioner
5. Ms. Debbie Lupold, Current Treasurer, East Pennsboro Twp
6. Mr. Dennis McMaster, former Chief of Police of East Pennsboro Twp
7. Mr. Daniel Hausenauer, former Police Officer of East Pennsboro Twp

Although you told Attorney Autry in front of me that Mr. Pietropaoli was going to use the Twp Police Officers to handover those Subpoenas to the incumbent and former officials/policy makers, including Mr. Robert Gill, former East Pennsboro Twp Manager, only Mr. Gill was present at the Court House while none of the absentees were excused by the Court.

As you clearly know, Plaintiffs had clearly convinced the trial Court why the testimonies of these key witnesses were sought. In addition, in opposition to Defendants' Motions in Limine, Plaintiffs strongly argued that Mr. Wayne Melnick was the proponent of the reversal of the zoning ordinance related to the number of parking spaces, and his testimony was very crucial to the Plaintiffs case as explained in the pretrial motions, and had convinced the trial Court to produce these witnesses.

Plaintiffs also noticed that a number of crucial pretrial exhibits with minutes of the Board of the Twp Commissioners' meetings were NOT presented by Mr. Autry to the jury due to some unexplained reasons.

Plaintiffs are still awaiting a response from Attorney Jeff Conrad, Partner of Clymer Law Offices to obtain a number of crucial documents needed to file their Brief and Appendix to the 3rd Circuit Court of Appeals. Most important documents include originals of all the exhibits submitted to the Trial Court and those provided to the jury. Plaintiffs strongly believe that there a number of very crucial evidences that were provided in the Pretrial Submissions to the Trial Court were not presented to Hon. Judge Kane and the jury. Plaintiff Gnana Chinniah clearly remembers that their former counsel, Mr. Autry was refusing to even bring some crucial exhibits on the screen during Plaintiffs testimony to convince the Court.

Therefore, Plaintiffs are forced to notify the Clerk of Courts at the 3rd Circuit Court of Appeal and the Chambers of Hon. Judge Kane that they will not be able to timely file their Brief and Appendix due to the difficulties as mentioned above. Please respond to this email to let me know if you would concur with the Plaintiffs in seeking a 30 day extension to file these documents as the missing documents are very crucial for an accurate and fair appeal filings to the 3rd Circuit Court.

Sincerely,
Gnana Chinniah

From: chinniahg@hotmail.com
To: jeff.conrad@clymerlaw.com; jautry@laverylaw.com; chrisu@hublaw.com; brandonh@hublaw.com
CC: emily.bell@clymerlaw.com; mary.dodds@clymerlaw.com; cristina.guthrie@clymerlaw.com
Subject: RE: Chinniah, et al. v. East Pennsboro Township and Jeffrey S. Shultz
Date: Fri, 26 Sep 2014 07:55:10 -0400

Dear Mr. Conrad,

Thank you very much for your truthful response that you have my entire file with crucial documents needed for my Brief to the 3rd Circuit Court of Appeal. It is time for you to state exactly what that personal word is whether I should not include Clymer Law Offices in Malpractice Lawsuit or in any Complaints to the Supreme Court's Disciplinary Board. Please provide your preconditions for returning my file in writing for me to consider my options accordingly.

Sincerely,
Gnana Chinniah

From: jeff.conrad@clymerlaw.com
To: chinniahg@hotmail.com
CC: emily.bell@clymerlaw.com; mary.dodds@clymerlaw.com; cristina.guthrie@clymerlaw.com
Subject: Re: Chinniah, et al. v. East Pennsboro Township and Jeffrey S. Shultz

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Date: Thu, 25 Sep 2014 19:05:23 +0000

I am willing to give u the whole file. I'd just like a personal word with you first.

Jeffrey A. Conrad, Esquire
Clymer Musser & Conrad, P.C.
408 W. Chestnut Street
Lancaster, PA 17603
717-299-7101

On Sep 25, 2014, at 3:03 PM, "Gnana Chinniah" <chinniahg@hotmail.com> wrote:

Dear Mr. Conrad,

Thank you for your response. I really need you to get in touch with Mr. Autry to identify and go through the list of items in your possession so I can find out if Atty. Underhill would be able to provide the rest of the items in my email below so I can notify the Clerk of Courts in Philadelphia and Judge Kane's Chambers accordingly.

Sincerely,
Gnana Chinniah

From: jeff.conrad@clymerlaw.com
To: chinniahg@hotmail.com
CC: emily.bell@clymerlaw.com; mary.dodds@clymerlaw.com
Subject: Re: Chinniah, et al. v. East Pennsboro Township and Jeffrey S. Shultz
Date: Thu, 25 Sep 2014 16:21:04 +0000

Mr. Chinniah, I sincerely think you and I need to chat. Kindly, call me at your earliest convenience. 717 951 7353

Jeffrey A. Conrad, Esquire
Clymer Musser & Conrad, P.C.
408 W. Chestnut Street
Lancaster, PA 17603
717-299-7101

On Sep 25, 2014, at 12:00 PM, "Gnana Chinniah" <chinniahg@hotmail.com> wrote:

Dear Mr. Autry,

As you clearly know, I only got the clear plastic boxes with the transcripts, Plaintiff's exhibit binder, and the yellow note pad with my questions/comments to you during the trial with your written responses to me that include what the Court Staff told you regarding what jury's

Printed Message

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feedback to (Ms. Cihack?) about Defendant's time killing strategy on Friday afternoon to push the jury deliberations to Monday.

Anyway, I never received any of the items listed below in my email below that need your immediate attention to coordinate with your former employer, Clymer Law Offices. Please respond to this email after verifying with Atty. Conrad and Ms. Stein when and where I can get all those documents that were never handed over to me. You once again have shown your "fox mentality" of betraying your own clients when you were with Boyle Law Office and wherever you go.

Remember, I am like the "Jewish farmer" as I explained in my email below and I hope I don't have to tie a bell around your neck as well and we will be able to get the crucial documents without filing some paperwork wherever needed.

I look forward to receive a sensible and truthful response from those to who the email is being sent to.

Sincerely,
Gnana Chinniah

From: JAutry@laverylaw.com
To: chinniahg@hotmail.com; chrisu@hublaw.com;
josh.autry@clymerlaw.com
CC: brandonh@hublaw.com; mary.stein@clymerlaw.com;
jeff.conrad@clymerlaw.com
Subject: RE: Chinniah, et al. v. East Pennsboro Township and Jeffrey S. Shultz
Date: Wed, 24 Sep 2014 20:20:20 +0000

Mr. Chinniah,

I do not have any of your file, so I cannot provide you these documents. I believe that my prior firm provided you the entire file. If there is anything that you believe you are missing, you will have to request those records directly from them. I have copied Mary Stein and Jeff Conrad from my prior firm on this e-mail.

Sincerely,

Josh

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Joshua M. Autry

Lavery Faherty Patterson
225 Market Street, Suite 304
Harrisburg, PA 17101
P: (717) 233-6633

F: (717) 233-7003

Follow me: www.twitter.com/joshautry

Connect: <http://www.linkedin.com/in/joshautry/>

<image002.png>

****IMPORTANT NOTICE****

The information contained in this email transmission is privileged and confidential and subject to the attorney/client privilege, and is otherwise protected from disclosure under applicable law. This transmission is intended only for the use of the individual or entity to which it is herein addressed. If the reader of this transmission is not the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this transmission or any information contained herein is strictly prohibited.

If you have received this transmission in error, please call 717-233-6633 and return the transmission to us via email, fax (717) 233-7003, or U.S. First Class mail. We will promptly reimburse you for any costs you incur.

From: Gnana Chinniah [<mailto:chinniahg@hotmail.com>]
Sent: Wednesday, September 24, 2014 4:07 PM
To: chrisu@hublaw.com; josh.autry@clymerlaw.com; Joshua M. Autry
Cc: Brandon S. Harter
Subject: RE: Chinniah, et al. v. East Pennsboro Township and Jeffrey S. Shultz

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Dear Mr. Autry,

Thank you for taking my call and your promise to provide the necessary cooperation on this serious matter involving Brief to the 3rd Circuit Court of Appeal.

I look forward to receive similar responses from Mr. Underhill and Mr. Harter as well.

Sincerely,
Gnana Chinniah

From: chinniahg@hotmail.com
To: chrisu@hublaw.com; josh.autry@clymerlaw.com
CC: brandonh@hublaw.com
Subject: RE: Chinniah, et al. v. East Pennsboro Township and Jeffrey S. Shultz
Date: Wed, 24 Sep 2014 12:15:54 -0400

Dear Mr. Underhill and Mr. Autry:

I am writing this email on the following serious issues that require your prompt assistance:

1. I need to get the originals of all of Plaintiffs' Exhibits produced to the District Court and list of those produced to the jury during the trial. I was told that I need to get this from the Counsel(s)
2. Copies of the Subpoenas served to Mr. Underhill on the day of Pre-Trial Conference in November 2013 which Mr. Underhill handed over to Mr. Pietropaoli in front of me at the Court House right after the "Closed Door Meeting" without me or Mr. Pietropaoli with Judge Kane
3. List of Defendants' Exhibits produced during the trial as I have only the CDs of both parties exhibits that were produced during the Pre-Trial Submissions and NOT those produced during the trial for some reasons my Mr. Autry never explained to me

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4. When and where I can collect the originals of Plaintiffs' Exhibits and copies of ALL the Subpoenas served by the Plaintiffs' as I was invoiced for over half a dozen witnesses who never showed up at the Court to present their testimonies that needs to be brought to the attention of Honorable Judges at the 3rd Circuit Court of Appeal. Most importantly Mr. Hertzler, Mr. Melnick, Mr. McMaster, Mr. DeMartyn, and several key witnesses.

5. If any of you will have any objection for me to present some emails and the handwritten notes on yellow sheets that Mr. Autry wrote as his response to my questions when Mr. Underhill was trying to drag the afternoon session on Friday by reading codes books and Mr. Pietropaoli, Mr. Gill, Ms. Brandi and several others were describing their office layout etc to push the jury deliberations on Monday in an attempt to achieve what they have achieved. I intend to produce Mr. Autry's notes on yellow sheet that the Court Staff had told him that the Defendants were wasting their time as the Jury have already concluded their opinion. Mr. Underhill was also trying another attempt by notifying the Court staff that he was having a bleeding nose right after the lunch break and wanted to cancel the afternoon session on Friday to push the deliberations past weekend that you all know very well.

I look forward to receive a sensible response from you both so I can file my brief/motion.

Sincerely,

Gnana Chinniah

From: chinniahg@hotmail.com

To: chrisu@hublaw.com; rhamilton@cadiehlaw.com

CC: brandonh@hublaw.com

Subject: RE: Chinniah, et al. v. East Pennsboro Township and Jeffrey S. Shultz

Date: Fri, 25 Jul 2014 11:47:27 -0400

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Mr. Underhill,

Thanks for alerting me about my mistake/unintentional copying by clicking either reply all instead of forward the button. Like you are, I am a computer illiterate sometimes doing things without paying much attention like your computer geek.

Thanks,
Gnana

From: chrisu@hublaw.com
To: chinniahg@hotmail.com; rhamilton@cadiehlaw.com
CC: brandonh@hublaw.com
Subject: RE: Chinniah, et al. v. East Pennsboro Township and Jeffrey S. Shultz
Date: Fri, 25 Jul 2014 14:42:20 +0000

Mr. Chinniah:

I received the email below. I read part of the first paragraph and realized that Bob may be a new attorney for you. Did you intend Mr. Harter and me to receive the email? If not, we will destroy any copies and delete from our system. If so, then it will go into the file.

C.S. Underhill

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[<image003.png>](#)

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From: Gnana Chinniah [<mailto:chinniahg@hotmail.com>]
Sent: Thursday, July 24, 2014 8:44 PM
To: Christopher S. Underhill; rhamilton@cadiehlaw.com
Cc: Brandon S. Harter
Subject: RE: Chinniah, et al. v. East Pennsboro Township and Jeffrey S. Shultz

Hi Bob,

Please see my reply to the "preferred attorneys" of some Court rooms in Hbg as I now tend to believe there is some truth in what Atty. Don Bailey was claiming although I don't agree with all of his opinion. As you have read and agree with me, there are lot of self admissions of "selective enforcement" that this Court failed to notice and failed to properly guide the Jury to arrive at the right verdict. For example, Judge Kane herself is quoting to the "undated and unsigned letter from Kimberly Brown to portray the Dr. Kapoors as violators knowing that this property was owned by the previous white, non-Indian owner, Kevin Felmlee during February 2007 when the unit became vacant with rotting food and broken windows etc. (2 months prior to the purchase by Dr. Kapoors on April 9, 2007). Similarly, another letter from Stacey Tinkey also acknowledges that most of the violations/defects such as broken steps etc existed as evidenced by

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"Kevin was supposed to do this and that". I will walk you through the exhibits produced not produced by Josh (intentionally to help the defense) so we can better word this in our brief to the 3rd Circuit so we explain the mistakes including Class-of-One equal protection and Substantive due process violations as evidenced by Defendant Shultz's flip-flop and lies throughout this litigation. I will add more stuff to clarify the "quite literal double standard" and the self serving misstatements to confuse this Court and Jury to murk the distinctions between the two codes. In addition, we have to fully re-state the PA UCC 2004 and its inapplicability to my property due to exclusions of the law. Like Honda Accord and Toyota Camry are very distinct although both may have ABS like defendants' attempts to claim both codes have fire stopping requirements when in fact UCC is more stringent and that is the code defendants still intend to use for the remaining many aspects of the construction yet to be completed and inspected by Jeff Shultz with the blessings of the policy makers of EPT.

I will also tell you more about the texting of my "Smart" Counsel from the restroom during each and every break and his complete avoiding of me and my wife on the day the Jury gave their contradictory verdict. Like you and Craig said, I am seriously considering a malpractice suit although now I have to focus on the brief to the 3rd Circuit to convince the 3 Judges who themselves are attorneys as opposed to the Jury in Central PA who don't have much sympathy to us anyway. This is what the defendants must have been gambling when they decided to take this case to trial. As far as I am concerned, I have already won in my goal i.e. to educate our people and other minorities of the Twp to stand up for their right which is already evidence by the opinion on the Summary Judgment "Defendants quite literally adopted a double standard when he inspected the framing at the time the property was owned by an Indian man as opposed to a White man". As you and everyone noticed from the blogs there are some reasonable people who acknowledged that East Pennsboro has been so redneck and it is time for the Indians to take the matter to federal. I am prepared to take this matter to DC if required. I am like the Jewish farmer who chose to tie the bell around the neck of the fox that has been killing his sheep. The reason is that the sheep would be better prepared to face the fox and the fox will eventually die out of starvation as there won't be any more prey. Same thing here...Central PA already knows the redneck mentality of EPT and the ill-treatment to many including myself, Dr. Kapoor, and Mr. Modi. It is going to get the broader attention to the entire Eastern US and the Indians are going to become more educated to stand up for their right instead of become violated/railroaded like the Dr. Kapoors who paid a very heavy price as evidenced in my post-trial motion etc.

I will send you the emails I have to include in the Appendix to disprove the false affidavits by those two clowns. I will also give you the copies of at

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least half a dozen subpoenas that were served to the adverse witnesses that the defendants failed to produce partly due to the conspiracy of former Boyle Law office attorneys. We will have include them and Clymer in the malpractice suit and the complaint to the Supreme Court disciplinary board as they are very crucial in addition to the inflated invoices contrary to the retainer agreement and professional ethics and codes of conduct. I will give you a draft for your edits as soon as we finish what we have in hand including Chase Mortgage episode!! In a way, they got away by their dramas of blindfolding Judge Kane by their "honesty" in notifying her to eliminate a possibly more "civilized" /reasonable jury during the jury selection because my clown used the same elevator as this jury when they arrived.

I have already given my "blessing" to this guy who would have already started to see what I told him was coming. I have seen the downfalls of many including Sandusky, his former counsel Rominger and "kids for cash" judges etc. I will leave it to God as the law of natural justice will never fail even if the US legal system fails.

I will be touch to set up a time to meet you in person to discuss matter further.

Regards,
Gnana

From: chinniahg@hotmail.com
To: chrisu@hublaw.com
CC: brandonh@hublaw.com
Subject: RE: Chinniah, et al. v. East Pennsboro Township and Jeffrey S. Shultz
Date: Tue, 22 Jul 2014 17:52:35 -0400

I am not sure if the 3rd Circuit has already lifted the Supersedeas? I am sure you guys know better than this!!

From: chrisu@hublaw.com
To: chinniahg@hotmail.com
CC: brandonh@hublaw.com
Subject: Chinniah, et al. v. East Pennsboro Township and Jeffrey S. Shultz
Date: Tue, 22 Jul 2014 18:51:28 +0000

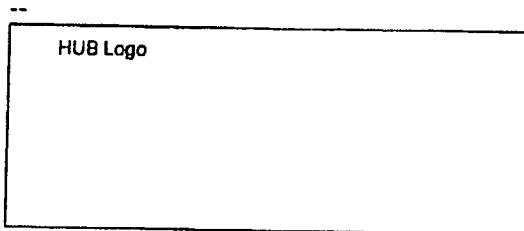
Dear Mr. and Mrs. Chinniah:

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I am going to file a Motion to lift the stay on Defendants' Bill of Costs because your Post-Trial Motion has been denied. Please advise if you concur or do not concur in that motion being filed. Please let me know by the end of this week.

C.S. Underhill



Christopher S. Underhill, Esq.

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CERTIFICATE OF SERVICE

I, Gnana Chinniah on this day of April 1, 2016 hereby certify that I am serving the copy of the foregoing Motion/Brief upon the persons by First Class US Postal Service addressed as below:

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Date: April 1, 2016